



Comcast Corporation
300 New Jersey Avenue, NW
Suite 700
Washington, DC 20001

September 23, 2013

Via Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: *Rural Call Completion*, WC Docket No. 13-39

Dear Ms. Dortch:

On September 20, 2013, Andrew Fisher, Robert Munoz, and the undersigned of Comcast Corporation ("Comcast") met with William Dever, Lisa Gelb, Carol Simpson, Steve Rowings, Greg Kwan and Richard Hovey of the Wireline Competition Bureau, and Margaret Dailey and Chris Killion of the Enforcement Bureau. The purpose of the meeting was to discuss the pending Notice of Proposed Rulemaking in the above-captioned docket.¹

Comcast stated that the call detail identified in the NPRM is commercially and competitively sensitive and, if collected, should be treated as presumptively confidential. Comcast also emphasized that the Commission should employ metrics that are designed to properly measure the ability of networks to deliver calls to the terminating location and exclude calls that are not relevant to an assessment of a carrier's completion performance, such as toll-free calls. Comcast also cautioned against the use of sample sizes that are too small to provide a reliable snapshot of a service provider's performance in completing calls to a particular rural exchange.

Finally, Comcast explained that because a service problem may occur at any point between the originating and terminating points of a call, Comcast supports the adoption of the limited reporting obligations for terminating carriers detailed in Comcast's comments.

¹ Notice of Proposed Rulemaking, FCC 13-18, 28 FCC Rcd 1569 (2013).

Pursuant to section 1.1206(b)(2) of the Commission's rules, 47 C.F.R. § 1.1206(b)(2), this ex parte notification is being filed for inclusion in the public record of the above referenced proceeding.

Respectfully submitted,

/s/ Mary McManus

Mary McManus

cc: Margaret Dailey
William Dever
Lisa Gelb
Richard Hovey
Chris Killion
Greg Kwan
Steve Rowings
Carol Simpson